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## 1. Regarding: Measurements related problems in the MCPS Wi-Fi Report

We have analysed the measurement report and would like to note the following:

- In the **Comparison-table 2.2.** the MCPS provides only average values, no peak values. In cell phone technologies (like GSM) the difference between average and peak value is 2-fold. **In Wireless local area technologies like Wi-Fi, the difference between average value and peak value is up to 100-fold** (Ferro & Potorti, 2005). Note that in the table 2.2. by the MCPS only average values are presented. Later you provide **in the chapter 7.2.2 Maximum, Instantaneous Power Density, which needs attention since these levels occasionally exceeded in your school measurements allowable EMC-levels (EN60601-1 → 3 V/m) for medical instruments** (Robinson *et al.*, 2003).

- **Almost all MCPS measurements were done in the near field of the devices under 3 wavelengths.** The wavelength for 2,4 GHz is 12,5 cm and for 5 GHz is 6 cm. That means that the near field will be <37,5 cm for 2,4 GHz and <18 cm for 5 GHz. In order to assess power density exposure in near field one needs to measure both electric and magnetic field components.

- The MCPS has not provided **information about Wi-Fi technology, namely it's beacon signal.** This signal, officially **SSID (Service Set Identifier)**, is created by the access point (AP) by sending constantly SSID 10 times in a second, at 10 Hz (Ferro and Poporti, 2005). **Mobile industry has patented technology to avoid this constant SSID sending for health reasons** (Swisscom, 2004). This SSID sending at 10 Hz is an additional risk-factor and it should be mentioned. Our brain operates in alpha, beta and gamma bands. This Wi-Fi beacon overlaps the alpha band. Low-frequency EMFs (including low-frequency pulses) have an effect on evoked potentials of the brain (Carrubba *et al.*, 2008).

- Because of the risk of this 10 Hz Beacon signal of Wi-Fi, The European Academy for Environmental Medicine has assigned very strict precautionary RF-levels for Wi-Fi (Belyaev et al., 2015). Please, pay attention to Wi-Fi RF power density peak-levels in the next picture.

RF source Max Peak/Peak Hold	Daytime exposure	Nighttime exposure	Sensitive populations <sup>1)</sup>
Radio broadcast (FM)	10,000 $\mu\text{W}/\text{m}^2$	1000 $\mu\text{W}/\text{m}^2$	100 $\mu\text{W}/\text{m}^2$
TETRA	1000 $\mu\text{W}/\text{m}^2$	100 $\mu\text{W}/\text{m}^2$	10 $\mu\text{W}/\text{m}^2$
DVB-T	1000 $\mu\text{W}/\text{m}^2$	100 $\mu\text{W}/\text{m}^2$	10 $\mu\text{W}/\text{m}^2$
GSM (2G) 900/1800 MHz	100 $\mu\text{W}/\text{m}^2$	10 $\mu\text{W}/\text{m}^2$	1 $\mu\text{W}/\text{m}^2$
DECT (cordless phone)	100 $\mu\text{W}/\text{m}^2$	10 $\mu\text{W}/\text{m}^2$	1 $\mu\text{W}/\text{m}^2$
UMTS (3G)	100 $\mu\text{W}/\text{m}^2$	10 $\mu\text{W}/\text{m}^2$	1 $\mu\text{W}/\text{m}^2$
LTE (4G)	100 $\mu\text{W}/\text{m}^2$	10 $\mu\text{W}/\text{m}^2$	1 $\mu\text{W}/\text{m}^2$
GPRS (2.5G) with PTCCH <sup>*</sup>	10 $\mu\text{W}/\text{m}^2$	1 $\mu\text{W}/\text{m}^2$	0.1 $\mu\text{W}/\text{m}^2$
(8.33 Hz pulsing)			
DAB+	10 $\mu\text{W}/\text{m}^2$	1 $\mu\text{W}/\text{m}^2$	0.1 $\mu\text{W}/\text{m}^2$
(10.4 Hz pulsing)			
Wi-Fi 2.4/5.6 GHz (10 Hz pulsing)	10 $\mu\text{W}/\text{m}^2$	1 $\mu\text{W}/\text{m}^2$	0.1 $\mu\text{W}/\text{m}^2$

Picture. Precautionary levels for RF-radiation. **For Wi-Fi less than 10  $\mu\text{W}/\text{m}^2$  (peak value), which is 0,001  $\mu\text{W}/\text{cm}^2$  (peak value).** By the European Academy for Environmental Medicine (Belyaev *et al.*, 2015, p. 356)

- We would like to draw attention to long-term exposure related health risks.

**Radiofrequency radiation from Wi-Fi devices causes fertility problems** as shown by several in vivo and in vitro studies (see for example Atasoy *et al.*, 2013, Avendaño *et al.*, 2012, Dasdag *et al.*, 2015a, Shokri *et al.*, 2015).

Additionally, **RF-radiation from Wi-Fi access points (AP) causes oxidative stress in cells which leads to several disorders** (see for example Nazıroğlu *et al.*, 2012, Aynali *et al.*, 2013, Salah *et al.*, 2013). The overall detrimental impact of RF radiation induced oxidative stress is summarised in the review of Yakymenko *et al.* (2015).

## **2. Regarding: The IARC classification of RF-EMF as Group 2B, i.e., ‘possibly’ carcinogenic to humans and the MCPS Report’s inaccurate interpretation**

The classification of radiofrequency electromagnetic fields (RF-EMF) as Group 2B, i.e., ‘possibly’ carcinogenic to humans, was made by 30 scientists from 14 countries at a meeting 2011 for the International Agency for Research on Cancer (IARC), World Health Organization (IARC 2011, Baan et al. 2012). **The working group mainly based their classification on one cohort study (Schüz et al., 2006) and five case-control studies (Muscat et al., 2000, Inskip et al., 2001, Auvinen et al., 2002, The Interphone study group, 2010, Hardell et al., 2011).**

**They also reviewed more than 40 studies that assessed the carcinogenicity of RF-EMF in rodents, including seven 2-year cancer bioassays and also many studies with endpoints relevant to mechanisms of carcinogenesis, including genotoxicity, effects on immune function, gene and protein expression, cell signaling, oxidative stress, and apoptosis (Baan et al., 2011).**

The referred INTERPHONE study (The Interphone study group, 2010), in the MCPS radiation report, was one of the case-control studies. **The Interphone study was a multicentre study of mobile phone use and brain tumours, including malignant tumours in the brain as glioma and benign tumours as acoustic neuroma and meningioma.** The pooled analysis included 2708 glioma cases and 2972 controls (participation rates 64% and 53%, respectively). In the Interphone study a regular user of mobile phones had an average of at least one call per week for a period of  $\geq 6$  months.

**This very low user group was compared to several other groups of low users compared to nowadays more extensive use of mobile phones.** The highest group of users,  $\geq 1640$  hours was divided in three sub groups depending on how many years they had used a mobile phone. For the shortest time span on 1-4 years only 23 of the glioma cases and 8 of the controls had used their mobile phones for more than 1640 hours. If any of these 23 persons with a brain cancer or any of the 8 controls had used their mobile phones for only one year they would have used it at least in average for four and a half hours a day during a year. If they instead had talked in their mobile phones during four years it would be for an average of a little more than an hour a day.

For the group of users between 5 and 9 years, 84 cases and 73 controls, the use per day would be at least between 54 minutes and 30 minutes. **For the long user group of 10 years or more, 93 cases and 73 controls, they talked in their mobile phones for 27 minutes a day or less for more than 10 years of use.**

For the main part of cases their use of mobile phones had been for a lot less than four hours a day. Today when most people use only their mobile phone and landline phones both at home and at work are becoming scarce, an amount of 4 hours or more wireless telephone use / day for salesman, telephone operators and so on is not uncommon.

In the Interphone study there was an statistical significant increased risk for a malignant brain tumour of 1.4 times (odds ratio, OR, 1.4, 95% CI 1.03-1.89) only for the highest user group of a total on more than 1640 hours.

Hardell et al. (2011) in Sweden found that **cases who had used a mobile phone for more than 1 year had an increased risk for glioma of 1.3 (OR 1.3, 95% CI 1.1-1.6).**

The risk increased with increasing time since first use and with total call time, reaching 3.2 times (OR 3.2, CI 2.0-5.1) for more than 2000 hours of use. Use of the mobile phone on the same side of the head as the tumour was associated with higher risk.

Since 2011 several other studies have been published which are strengthening the possible association between RF-EMF and cancer. Using the Bradford Hill viewpoints for evaluating strengths of evidence of the risk for brain tumours associated with use of mobile and cordless phones the classification should be upgraded to group 1 carcinogen, i.e., “the agent is carcinogenic to humans” (Hardell & Carlberg, 2013).

New case-control studies have verified Hardell's studies (Coureau et al., 2014) and up to 20 years of mobile phone use have found even higher risk for brain tumours (Hardell & Carlberg, 2015).

A newly published study has found a tumor promotion effect on mice from exposure to radiofrequency electromagnetic fields below exposure limits for humans (Lerchl *et al.*, 2015). RF-EMFs do not cause direct DNA damage. On the contrary **numerous studies have shown generation of reactive oxygen species (ROS) that can cause oxidative damage of DNA. This is a well-known mechanism in carcinogenesis for many agents.** The broad biological potential of ROS and other free radicals makes radiofrequency radiation a potentially hazardous factor for human health, not only cancer risk but also other health effects (Yakymenko *et al.*, 2015).

The IARC classification of RF-EMF as Group 2B, possibly carcinogenic to humans, doesn't only include exposure from mobile phones near the ear. **The classification includes all sources of RF-EMFs.** The exposure from mobile phone base stations, Wi-Fi access points, smart phones, laptops and tablets can be long term, sometimes around the clock both at home and at school. **This constant exposure to lower levels of exposure may be as deleterious to health as higher exposure during short time** (Fragopoulou et al., 2012, Dasdag et al., 2015b). **This risk may be accentuated for children because their probable longer use of wireless devices** (Morgan et al., 2014). **Children are also growing and have more immature cells which can be more sensible to RF-EMF** (Markova et al., 2010 )

**In conclusion, long term health effects from RF EMFs are still under investigation and a significant amount of troublesome scientific evidence has surfaced. By using wireless technologies at close range, long term health risks cannot be excluded. Therefore, we recommend schools to use wired technologies.**

Respectfully submitted

Sincerely,



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